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Attorneys for Federal Defendants

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

Pursuant to Local Rule IA 6-1, Plaintiffs Animal Wellness Action, Cana Foundation, the Center for a Humane Economy, Laura Leigh, and Wild Horse Education, and Defendants United States Department of Interior, Bureau of Land Management (“BLM”), and Jon Raby, in his official capacity as Nevada State Director of the BLM, (collectively, the “Parties”), by and through their undersigned counsel, hereby stipulate and respectfully request that the Court extend the time to file any motions related to attorneys’ fees and costs 60 days, until August 12, 2024. In support of this request, the Parties declare:

WHEREAS, on March 28, 2024, the Court issued an opinion and order on the Parties' cross-motions for summary judgment. ECF No. 81.

WHEREAS, on March 29, 2024, judgment was entered by the Clerk of the Court. ECF No. 82.

WHEREAS, on April 10, 2024, the parties filed a joint stipulation to extend the time needed to explore the settlement of attorneys' fees and costs. ECF No. 83.

WHEREAS, on April 11, 2024, the Court granted the parties' joint stipulation. ECF No. 84.

WHEREAS, the Parties remain interested in and are working cooperatively towards settlement. Counsel for the Defendants has been delayed in responding to a settlement offer by Plaintiffs due to unexpected litigation deadlines, including extensive travel, depositions, and emergency motions. The Parties now agree that additional time is needed to explore the settlement of attorneys' fees and costs.

WHEREAS, this is the second stipulation for an extension of time to file a motion for attorneys' fees and costs.

WHEREAS, it is well-established that the court has the inherent power to “control the disposition of the causes on its docket with economy of time and effort for itself, for counsel, and for litigants.” *Landis v. North Am. Co.*, 299 U.S. 248, 254 (1936); *CMAX, Inc. v. Hall*, 300 F.2d 265, 268 (9th Cir. 1962); *Leyva v. Certified Grocers of California*, 593 F.2d 857, 863-64 (9th Cir. 1979).

NOW, THEREFORE, IT IS STIPULATED BY AND BETWEEN THE PARTIES,
AND THE COURT ORDERS, AS FOLLOWS:

1. Upon entry of the Court's order, the deadline to file any motion for attorneys' fees and costs is extended from June 11, 2024, until August 12, 2024.

IT IS SO STIPULATED.

Dated: June 6, 2024

Respectfully submitted,

TODD KIM

1 Assistant Attorney General
2 U.S. Department of Justice
3 Environment & Natural Resources Division
4 S. JAY GOVINDAN, Section Chief
5 BRIDGET K. MCNEIL, Assistant Section Chief

6 /s/ Samantha G. Peltz
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1 IT IS SO ORDERED:
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3 Hon. MIRANDA M. DU
4 UNITED STATES DISTRICT JUDGE
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DATED: _____

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2 **CERTIFICATE OF SERVICE**
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4 I hereby certify that on June 6, 2024, I electronically filed the foregoing document with
5 the Clerk of the Court for the United States District Court for the District of Nevada using the
6 Court's CM/ECF system. Participants in the case who are registered CM/ECF users will be
7 served by the appellate CM/ECF system, which includes counsel of record for all parties in the
8 case.
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10 */s/ Samantha G. Peltz*
11 SAMANTHA G. PELTZ
12 Attorney for Defendant
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